

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States of  
America, et al.,

Defendants.

NO.

DECLARATION OF C.L.

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ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

1 I, C.L., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal knowledge.

4 2. I am a licensed Marriage and Family Therapist (LMFT) in Washington state. I  
5 earned a master's degree in Marriage and Family Therapy. I earned a Bachelor of Arts in Political  
6 Economics. I've been a licensed therapist for 10 years. During my career I have worked in private  
7 practice, homeless outreach programs, and the foster care system.

8 3. Throughout my time in private practice, I have primarily worked with queer and  
9 trans youth, typically seeing 20-25 patients each week, 80% of whom were trans youth. In 2021,  
10 I started primarily working with parents of trans kids and with trans adults. I use evidence-based  
11 therapeutic modalities such as cognitive behavioral therapy (CBT) and dialectical behavioral  
12 therapy (DBT) with all my clients, regardless of whether they are cisgender or transgender.

13 4. Currently, I work for a mental health private practice that offers high crisis mental  
14 health support for queer and trans individuals, relationships, and families. I am a consultant for  
15 therapists supporting transgender individuals and educating clinicians on best practices for  
16 supporting clients and their families.

17 5. My experience working with trans youth is not so different from my experience  
18 working with cisgender youth. For example, with all my young clients, we explore what they  
19 want to be when they grow up. We work on handling emotional overwhelm. I validate them for  
20 who they are and help them see that they are loved. For the most part, the young people I see  
21 (whether they are cisgender or transgender) need similar types of support from therapy.

22 6. Working with kids in therapy often involves working with the whole family and  
23 helping parents and caregivers support their kids. I give parents tools, in a strength-based way,  
24 to support their kids in being the person they want to be. My experience is that parents of trans  
25 kids and parents of cisgender kids both need this help and support. This is because all kids need  
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1 a space to be themselves, to play, to be seen, to be cared for. Everyone deserves to be safe,  
2 celebrated, and loved.

3 7. I coach parents on how to support their trans kids and affirm their gender.  
4 Sometimes that means using pronouns that align with their child's gender identity, letting them  
5 dress how they want, or using a name that feels good to them. Other times that means supporting  
6 their kid through gender-affirming medical care. Some of my trans youth clients choose to use  
7 puberty-blockers, hormone replacement therapy, and some choose to not access gender-  
8 affirming medical treatment. In the hundreds of trans youth I have worked with, 3 clients have  
9 accessed gender-affirming top surgery. No youth clients have been given access to any bottom  
10 surgery.

11 8. I have worked with youth who experience anxiety, depression, self-harm, eating  
12 disorders, suicidal ideation (thoughts of suicide), and sometimes plans and intent to carry out  
13 suicide. In my overwhelming experience working with youth – whether they are cisgender,  
14 queer, or trans – these negative symptoms arise when a child is not receiving the affirmation,  
15 validation, or support they need to be themselves. For some of my trans clients, it feels like they  
16 are screaming “this is who I am!” and no one hears them. This lack of validation feels like the  
17 weight of the world is on their shoulders. I tell these kids “I believe you, I see you, I appreciate  
18 you.” And I coach their families in delivering some of these same messages. Once these kids  
19 begin to receive affirmation from the people around them, I routinely see a decrease in anxiety,  
20 depression, self-harm, and suicidality. In my professional experience, affirming kids quite  
21 literally keeps them alive.

22 9. I have had people ask me: can a 14-year-old make decisions about gender-  
23 affirming care? My response to this, is: can a 14-year-old make a decision about whether they  
24 live or die? When trans youth who want gender-affirming care are able to access it, it keeps them  
25 safe.  
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1           10. I have worked with well over 100 trans youth. I have never had a client in my  
2 care that has killed themselves. I have never had a client that de-transitioned from transgender  
3 to cisgender. I have never had anyone who regretted receiving gender-affirming care.

4           11. I understand that the President of the United States has issued an Executive Order  
5 (EO) that limits gender-affirming care for trans youth and exposes providers and parents to legal  
6 and potential criminal liability.

7           12. If the EO is implemented, it is my professional opinion that trans people will die.  
8 Research shows that without access to gender-affirming care and support, trans people show  
9 incredibly high rates of suicidality. This EO also empowers people to bully and attack trans  
10 people. If this EO cuts federal funding for research, our entire therapeutic community will lose  
11 access to unbiased research into the best ways to care for our trans clients.

12           13. I find it nonsensical that the EO denies gender-affirming care to trans kids, when  
13 cis kids also receive gender-affirming care, including top surgery, hormone therapy, and puberty  
14 blockers.

15           14. The parents I work with are terrified by this EO. They are terrified their kids will  
16 be bullied and harassed, that their kids will not be able to use the bathroom, that their kids will  
17 self-harm and suffer suicidality, and the host of other mental health concerns that result from  
18 experiencing an invalidating environment. They are also worried that CPS will go after them and  
19 take their children from them.

20           15. I feel like my entire career is under attack. I have concerns that they are going to  
21 ban trans people from getting therapy and ban trans people from being therapists. I am worried  
22 I could be arrested for doing the job I am licensed to do.

23           16. I chose to use a pseudonym to protect my identity because I actively fear  
24 retaliation and harassment. I fear for my safety and the safety of my family, colleagues and my  
25 business practice.  
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1 I declare under penalty of perjury under the laws of the State of Washington and the  
2 United States of America that the foregoing is true and correct.

3 DATED this 4th day of February 2025 at whatcom Co, Washington.

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